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FILED

OCT 10 2024

U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

6 *Pro Se PG&E Fire Victim Claimant and Party to related proceedings before the California Public
Utilities Commission*

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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 In re:

13 PG&E CORPORATION,

14 -and-

15 PACIFIC GAS AND ELECTRIC
16 COMPANY,

17 Debtors.

- 18
- 19
- 20 Affects PG&E Corporation
- 21 Affects Pacific Gas and Electric Company
- 22 Affects both Debtors

23 * *All papers shall be filed in the lead case,
24 No. 19-30088 (DM)*

25 Bankr. Case No. 19-30088 (DM)
26 Chapter 11
27 (Lead Case)
28 (Jointly Administrated)

29 **WILLIAM B. ABRAMS STATEMENT
30 IN SUPPORT OF FAIRNESS FOR
31 FIRE VICTIMS AND OPPOSING THE
32 ASSOCIATED
33 MISREPRESENTATIONS AMONG
34 TRUST OVERSIGHT COMMITTEE
35 MEMBERS AND OTHERS ON CORE
36 COMMITTEES THAT UNDERMINE
37 VICTIM SETTLEMENTS AND THE
38 JUST TREATMENT OF FIRE
39 VICTIMS WITHIN THIS CASE**

PRELIMINARY STATEMENT

William B. Abrams (“**Abrams**”) as a PG&E victim, FVT claimant, and Northern California resident, submits this “William B. Abrams Statement in Support of Fairness for Fire Victims and Opposing the Associated Misrepresentations of Trust Oversight Committee Members and Others on Core Committees that Undermine Victim Settlements and the Just Treatment of Fire Victims Within this Case.” Abrams is compelled to file this Statement outlining facts that the Court, the Trustee and other parties with responsibilities to safeguard the integrity of this bankruptcy process and/or to protect the interests of fire victims should consider. Abrams files these papers with an abundance of caution given the threats and intimidation he has received within and outside this Court for shedding light on inconvenient facts surrounding this Case.

The Fire Victim Trust (“FVT”) Trustee has communicated to PG&E victims that if the FVT is not infused with additional monies, victims will only be paid ~75% of their settlements. Following, it is reasonable to consider that there are only two ways currently being pursued and/or supported by the Trustee and TOC Members to make up this shortfall and to make good on the “made whole” commitments to victims. These remaining last-ditch remedies include (1) the successful resolution of PG&E derivative cases where certain attorneys serving on the TOC have taken positions adverse to the interests of victims¹ and (2) reliance upon “Fairness for Fire Victims” efforts to lobby and legislatively restore victim’s rights to access the California Wildfire Fund.

Here, within this Statement, Abrams is providing additional information regarding the individuals and tactics driving this latter effort. The sole purpose of this statement is to encourage the core parties within this case (Trustee, certain TOC Members, certain TCC Members and certain Fire Claimant Professionals) to be transparent and disclose their sources of funding and activities that drive and support “Fairness for Fire Victims.” Abrams hopes these parties will voluntarily disclose without the need for victims like Abrams to file motions requesting Court ordered discovery and disclosures. This type of disclosure is particularly important given that many of these same individuals were officers, directors and coalition members of the “Up From The Ashes Coalition” which was instrumental in **excluding victims from the California Wildfire Fund** prior to plan confirmation. The lack of truthfulness and disclosure from these core parties at that time necessitates

¹ See "Exhibits to Support Motion of William B. Abrams Pursuant to Federal Rule of Bankruptcy Procedure 2004 for Entry of an Order Authorizing Discovery and Trust Compliance with Court Orders" [Dkt. 14559].

more scrutiny now when these same individuals are once again forming a “grassroots nonprofit” to advance the interests of victims to be 100% made whole.

BACKGROUND

Abrams filed motions to reconstitute the PG&E Fire Victim Trust (“FVT”) Oversight Committee to promote the just and fair treatment of PG&E Fire Victims. These papers included the “William B. Abrams Motion for Just Treatment of Victims Through the Reconstitution of the Fire Victim Trust Oversight Committee and Equitable Application of the Judicial Review Provisions Pursuant to U.S.C. §§ 1123(A)(4)” [Dkt. 8247] and the “William B. Abrams Motion to Enforce the Victim Trust Agreement and Replace All Members of the Fire Victim Trust Oversight Committee and to Support Efficient Trust Administration Pursuant to U.S.C. §§ 1123(A)(4) and Fire Victim Trust Agreement Section 6.2” [Dkt. 10748]. Within these papers Abrams noted that the “*Trust Oversight Committee (TOC) was constituted in a manner with clear conflicts of interest and self-dealing which are in direct violation of their fiduciary duties.*” Within these papers and others, Abrams provided evidence that Members of the Trust Oversight Committee, Members of the Tort Claimant Committee and Fire Claimant Professionals formed the “Up From the Ashes Coalition” (the “UFTA”) which was instrumental in **excluding victims from the California Wildfire Fund**. This nonprofit organization was dissolved after the International Brotherhood of Electrical Workers (“IBEW”) filed official complaints accusing the organization of “shadow lobbying” and violations of lobby laws. Subsequently, and despite knowledge of these facts, the Trustee and Trust Oversight Committee hired the same individual that led that organization to lead lobbying activities on behalf of the Fire Victim Trust until such time as he was accused of unrelated sexual misconduct. Are these same core parties within this case now leveraging similar tactics and funding to support a new “nonprofit” organization?

STATEMENT

23 Fire Victim Trust Oversight Committee Members and other attorneys serving on core
24 committees within this Case have indicated that they formed, funded and otherwise support a
25 “nonprofit” organization called “Fairness for Fire Victims” with the welcome and righteous goal of
26 getting victims 100% made whole. This organization established the internet presence
27 “firefairness.org” and subsequently presented itself as a “nonprofit” within social media sites
28 including on Facebook which asks victims, public officials and other organizations to support a

1 “simple” fix so that victims will be made 100% whole (*See Exhibit A*).² They have solicited
2 donations and claim to be engaged with their supporters in lobbying activities to amend AB1054 so
3 that the California Wildfire Fund may be accessed to infuse the FVT and make up the considerable
4 shortfall. Abrams is unaware if the individuals hired by this organization have sponsored legislation,
5 attended legislative hearings or otherwise engaged in any public activities to support these laudable
6 goals for victims. **Abrams is similarly unaware if the core attorneys within this case supporting**
7 **this nascent “nonprofit” are actively seeking these financial remedies to the FVT shortfall or**
8 **simply working to improve their image after they falsely represented to victims that AB1054**
9 **was a ticket to make them whole.** Given that many of these same parties (TOC Members, TCC
10 Members, Fire Claimant Professionals) previously formed a nonprofit organization (i.e. Up From the
11 Ashes) and misrepresented their role within that nonprofit to exclude victims from the same
12 California Wildfire Fund it is certainly reasonable to question whether or not their work this time
13 around to amend AB1054 through yet another “nonprofit” (i.e. Fairness for Fire Victims) is being
done with honesty and integrity. As we consider these questions, it is important for the Court and
parties to be aware of the following three facts:

- 14 1. **Company NOT a Nonprofit** – According the official entity formation documents filed
15 with the California Secretary of State (“SOS”) on May 23 and May 24, 2024, “Fairness
16 for Fire Victims” was not formed as a nonprofit but as a Limited Liability Company (*See*
17 **Exhibit B**). The production of the official annual report required by the SOS that might
18 shed light on the ownership structure, management structure and funding sources of this
19 company has recently been delayed by the company from the previous deadline of August
20 21, 2024 to the revised due date of May 31, 2026 (*See Exhibit C*). Of course, this revised
21 date for the submittal of the annual report is well after the date when it is expected that the
22 Fire Victim Trust will wind down. Why this company would pose as a nonprofit
23 supporting PG&E Fire Victims is unclear. Their actions on behalf of the victims within
24 this Case is also unclear.
- 25 2. **Fairness for Fire Victims Virtual Officers** – As stated within the official documents
26 filed with the California Secretary of State, this organization was formed by Pankaj S.
27 Raval, Agent of the Carbon Law Group. The sole Manager/Member named within these

28 ² See “Coalition Members” <https://www.firefairness.org/coalition>

1 papers is Thomas Brower. Abrams and many other victims are not aware of how Mr.
2 Raval or Mr. Brower are affiliated with this Case, the Trust or PG&E Wildfire Survivors
3 more broadly. More importantly, victims and the coalition members are unaware of how
4 these individuals and others are engaged in activities to support the stated “mission” of
5 this company which poses as a “nonprofit” organization. What is clear is that Mr. Raval
6 markets himself as a “Virtual General Counsel” through TikToc and other social media
7 sources.³ Abrams is unaware of why certain TCC and TOC member attorneys state that
8 they formed and support this “nonprofit” but are not publicly putting their names forward
9 as members, officers or coalition members of this organization. Perhaps when the Annual
10 Report is filed by May 31, 2026, victims will be told who is representing their interests
11 and how the activities of that organization are funded. Currently, when victims sign up as
12 coalition members, the stated Director of this organization is Mike Yates, President of
Local Teamsters 665.

- 13 3. **Fairness for Fire Victims “Virtual” Office** – According to the formation documents
14 filed with the SOS, Fairness for Fire Victims is located at “500 Capitol Mall, Suite 2350,
15 Sacramento, CA, 95814.” This “virtual office” is available through “Davinci Virtual” for
16 the low cost of \$69 per month and a one-time setup fee of \$150⁴ (See **Exhibit D**), Abrams
17 assumes that like Davinci this virtual setup is focused on painting the appearance of a
18 strong presence at our State Capitol fighting for victims to be made whole.

19 **CONCLUSION**

20 Abrams is confident that the Court is invested in ensuring justice for all parties including
21 PG&E victims. However, the Court should consider that a path towards justice in the dark is a
22 difficult road to travel and yet the only path seemingly afforded for victims within this case. The fact
23 that other classes of claimants (shareholders, bondholders, etc.) with an unobstructed view of the
negotiations on their behalf have been largely made whole and/or profited significantly from
24 settlements within this Case while victims are told to feel fortunate with scraps is proof positive that
25 sunlight matters. After our ~75% disbursement, 33% attorney fees and taxes that designate our

27 ³ See Fairness for Fire Victims “Virtual GC” at <https://www.tiktok.com/@virtualgc>

28 ⁴ See Davinci Virtual Office listing at <https://www.davincivirtual.com/loc/us/sacramento-virtual-offices/facility-3634>

1 recovery as “earned income,” victims and their communities will be devastated financially and
2 otherwise. Is this the judicial legacy we want to leave in the wake of this case? Indeed, the
3 exculpations, unconstitutional releases, confidentiality protocols and a lack of adherence to
4 foundational bankruptcy laws governing required disclosures will most likely mean that these
5 injustices that undermined the fabric of our communities will never see the light of day.

6 Here within this statement and the associated exhibits, we see that those claiming to represent
7 the interests of victims are not being forthcoming regarding who they are and what they are doing.
8 Of course, Abrams, like all other PG&E victims, hopes that “Fairness for Fire Victims,” Trust
9 Oversight Committee Members and the “Coalition Members” will work openly and collaboratively to
10 make victims 100% whole. As many individuals like Abrams and amazing organizations like After
11 the Fire USA work to support and advocate for victims, it is my hope that Fairness for Fire Victims
12 will become a meaningful partner. Certainly, victims need all the help they can get and there is room
13 for all types of organizations to further efforts for our families and our communities. Perhaps, the
14 nonprofit paperwork of Fairness for Fire Victims is in process and the company that was formed with
15 the same name and at the same time is just coincidence? Perhaps, the Annual Report will be filed
16 earlier than the 2026 target and it will demonstrate that our attorneys are engaged in laudable
17 activities on behalf of PG&E victims? Abrams and many other victims hope to learn that their fears
18 of being deceived yet again are unwarranted, but hope is not a strategy. We must learn from the prior
19 mistakes and the unwarranted trust victims placed in surreptitiously formed nonprofits that only
20 served to undermine their interests.

21 Now, the Court may take the position that these out-of-court activities as described within this
22 statement are not relevant to this case or that these statements just clog up the docket. However, the
23 evidence points to exactly the opposite view. The many influential and well-monied parties within
24 this case understood throughout this case that by simultaneously moving adjudication, legislation and
25 regulation, they could bend court decisions and processes to serve their interests. This triangulation
26 across judicial, regulatory and legislative processes paid off handsomely for these well-resourced
27 parties. On the other hand, victims including Abrams naively assumed that the Federal Bankruptcy
28 Laws and California Bar Association rules would ensure that the attorneys representing our interests
within the courtroom would not simultaneously represent opposing interests when forming
“nonprofits” and exerting influence in Sacramento and at the California Public Utilities Commission.

1 Now with rose-colored-glasses removed, Abrams once again brings these issues to the attention of
2 the Court and to core parties within this case in the hopes that this statement will bring more
3 transparency. Despite his best intentions, Abrams does understand that certain parties will continue
4 to attack the messenger, obfuscate, and work in the dark where just outcomes cannot be achieved.
5 However, hope springs eternal and Abrams along with the vast majority of PG&E Wildfire Survivors
6 and many of their attorneys that serve with integrity will continue to support the mission of Fairness
7 for Fire Victims so that PG&E victims and their communities may be made whole and recover from
8 these years of loss, tragedy and heartache. Abrams truly hopes that citizens and leaders across
9 California will further the mission of Fairness for Fire Victims and make victims and our
10 communities whole. Certainly, the core parties that represented victims within this case and the
11 clear-eyed leaders across this State know that leaving PG&E Wildfire Survivors and their
communities with ~75% isn't fair and it isn't justice.

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15 Executed on October 10, 2024, at Santa Rosa, CA.

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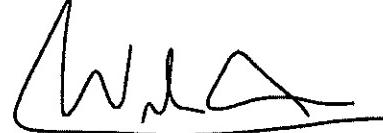
25

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Respectfully submitted,



William B. Abrams
Pro Se Claimant

EXHIBIT A: Fairness for Fire Victims “Nonprofit” Social Media

Facebook

The screenshot shows the Facebook profile of "Fairness for Fire Victims". The profile picture is a circular logo featuring a house with three peaks above it, labeled "FAIRNESS FOR FIRE VICTIMS". The page name is "Fairness for Fire Victims" with 4 likes and 8 followers. Below the page name, there are links for Posts, About, Mentions, Followers, Photos, Videos, and More. The "About" section describes the group as a grassroots coalition of survivors of the Northern California wildfires of 2015-2018. It includes a note that it is a nonprofit organization and lists hashtags: #cafirefairness, #cafirefairness, and #fairnessforgoing. The "Photos" section shows two thumbnail images: one of the profile picture and another of a wildfire scene. On the right, there is a post from July 8 showing a profile picture update with the caption "Fairness for Fire Victims updated their profile picture." Below the post is a large circular image of the profile picture.

Instagram

The screenshot shows the Instagram profile of "cafirefairness". The profile picture is the same circular logo as the Facebook page. The account name is "cafirefairness" with 0 posts, 3 followers, and 7 following. The bio reads: "Fairness for Fire Victims Nonprofit organization Fairness for Fire Victims is a grassroots coalition of survivors of the Northern California wildfires of 2015-2018." Below the bio, there are links for Posts and Tagged. At the bottom, it says "No Posts Yet". To the left of the Instagram profile, there is a sidebar with navigation links: Home, Search, Explore, Reels, Messages, Notifications, and Create.



EXHIBIT B: Entity Formation Documents

202462412320

STATE OF CALIFORNIA
Office of the Secretary of State
ARTICLES OF ORGANIZATION
CA LIMITED LIABILITY COMPANY
 California Secretary of State
 1500 11th Street
 Sacramento, California 95814
 (916) 657-5448

For Office Use Only

-FILED-

File No.: 202462412320

Date Filed: 5/23/2024

Limited Liability Company Name	Fairness for Fire Victims, LLC
Limited Liability Company Name	Fairness for Fire Victims, LLC
Initial Street Address of Principal Office of LLC	
Principal Address	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814
Initial Mailing Address of LLC	
Mailing Address	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814
Attention	Thomas Brower
Agent for Service of Process	
California Registered Corporate Agent (1505)	CARBON LAW GROUP, A PROFESSIONAL LAW CORPORATION Registered Corporate 1505 Agent
Purpose Statement	The purpose of the limited liability company is to engage in any lawful act or activity for which a limited liability company may be organized under the California Revised Uniform Limited Liability Company Act.
Management Structure	
The LLC will be managed by	One Manager
Additional information and signatures set forth on attached pages, if any, are incorporated herein by reference and made part of this filing.	
Electronic Signature	
<input checked="" type="checkbox"/> By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.	
Pankaj S Raval	05/23/2024
Organizer Signature	Date



STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION
LIMITED LIABILITY COMPANY

California Secretary of State
 1500 11th Street
 Sacramento, California 95814
 (916) 657-5448

For Office Use Only

-FILED-

File No.: BA20241021241
 Date Filed: 5/24/2024

Entity Details					
Limited Liability Company Name	Fairness for Fire Victims, LLC				
Entity No.	202462412320				
Formed In	CALIFORNIA				
Street Address of Principal Office of LLC					
Principal Address	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814				
Mailing Address of LLC					
Mailing Address	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814				
Attention	Thomas Brower				
Street Address of California Office of LLC					
Street Address of California Office	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814				
Manager(s) or Member(s)					
<table border="1"> <thead> <tr> <th>Manager or Member Name</th> <th>Manager or Member Address</th> </tr> </thead> <tbody> <tr> <td>+ Thomas Brower</td> <td>500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814</td> </tr> </tbody> </table>		Manager or Member Name	Manager or Member Address	+ Thomas Brower	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814
Manager or Member Name	Manager or Member Address				
+ Thomas Brower	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814				
Agent for Service of Process					
California Registered Corporate Agent (1505)	CARBON LAW GROUP, A PROFESSIONAL LAW CORPORATION Registered Corporate 1505 Agent				
Type of Business					
Type of Business	Legislative Advocacy				
Email Notifications					
Opt-in Email Notifications	Yes, I opt-in to receive entity notifications via email.				
Chief Executive Officer (CEO)					
CEO Name	CEO Address				
None Entered					
Labor Judgment					
No Manager or Member, as further defined by California Corporations Code section 17702.09(a)(8), has an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal is pending, for the violation of any wage order or provision of the Labor Code.					

Electronic Signature

By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.

Pankaj S Raval

Signature

05/24/2024

Date

**EXHIBIT C: Fairness for Fire Victims Statement of Information
Changing Annual Report Filing Deadline from 8/21/24 to 5/31/26**

Statement of Information - 5/24/2024			
Attribute Type	Field Name	Changed From	Changed To
Statement of Information	Annual Report Due Date	8/21/2024 12:00:00 AM	5/31/2026 12:00:00 AM
Control ID	Labor Judgement		N
Date			
5/24/2024			
Image Download			
Download			

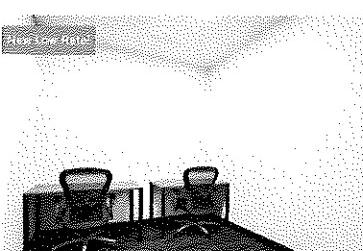
EXHIBIT D: Fairness For Fire Victims “Virtual Office”

DAVINCI Find your virtual office

Login Get a Live Quote 877-418-9327

DAVINCI Virtual > Virtual Office Locations > United States > California > Sacramento > 500 Capitol Mall

New Low Rate!



Map Satellite



500 Capitol Mall

New Low Rate!

Reserve your virtual office address at
500 Capitol Mall

500 Capitol Mall
Suite 2350
Sacramento, CA 95814

Req'd - California, Sacramento - 500 Capitol Mall
Personal Mail Box & Answered & Recorded
Minimum 6 month term applies

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500 Capitol Mall
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